

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

ROSY GIRON DE REYES; JOSE
DAGOBERTO REYES; FELIX ALEXIS
BOLANOS; RUTH RIVAS; YOVANA
JALDIN SOLIS; ESTEBAN RUBEN MOYA
YRAPURA; ROSA ELENA AMAYA; and
HERBERT DAVID SARAVIA CRUZ,

Plaintiffs,

vs.

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP; WAPLES PROJECT
LIMITED PARTNERSHIP; and A.J.
DWOSKIN & ASSOCIATES, INC.,

Defendants.

Civil Action No. 1:16cv00563-TSE-TCB

PLAINTIFFS' MOTION TO FILE DOCUMENTS UNDER SEAL

Pursuant to Local Civil Rule 5, Plaintiffs Rosy Giron De Reyes, Jose Dagoberto Reyes, Felix Alexis Bolanos, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz ("Plaintiffs") respectfully move the Court to file under seal Exhibits 3, 4, 7, 9, and 10 to Plaintiffs' Reply in Support of Plaintiffs' Objection, which consists of documents Defendants produced during the course of discovery and marked confidential pursuant to the Protective Order. (Dkt. No. 45.) and excerpts from a deposition transcript. In support of this Motion, Plaintiffs are submitting a Non-Confidential Memorandum, along with an appropriate Notice and Proposed Order.

DATED this 8th day of December, 2016 Respectfully submitted,

/s/ Paul Brinkman

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

Paul Brinkman, VSB # 35950

Jeanhee Hong (*pro hac vice*)

Ariel Wade Trajtenberg (*pro hac vice*)

Diego Durán de la Vega (*pro hac vice*)

Jongwook Kim (*pro hac vice*)

William A. Margeson (*pro hac vice*)

777 Sixth Street NW, 11th Floor
Washington, District of Columbia 20001

Phone: (202) 538-8000

Fax: (202) 538-8100

paulbrinkman@quinnemanuel.com

jeanheehong@quinnemanuel.com

arieltrajtenberg@quinnemanuel.com

diegoduran@quinnemanuel.com

wookiekim@quinnemanuel.com

billmargeson@quinnemanuel.com

LEGAL AID JUSTICE CENTER

Simon Sandoval-Moshenberg, VSB #77110

Rebecca Wolozin, VSB #89690

6066 Leesburg Pike, Suite 520

Falls Church, VA 22041

Phone: (703) 778-3450

Fax: (703) 778-3454

simon@justice4all.org

becky@justice4all.org

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of December, 2016, I filed the foregoing document electronically with the Clerk of the Court using the ECF system, and caused to be served by electronic mail a copy of the foregoing document upon the following parties:

Grayson P. Hanes, VSB # 06614
Michael S. Dingman, VSB #30031
Justin deBettencourt, VSB # 83806
REED SMITH LLP
7900 Tysons One Place, Suite 500
McLean, Virginia 22102
Phone: (703) 641-4200
Fax: (703) 641-4340
mdingman@reedsmith.com
jdbettencourt@reedsmith.com

Counsel for Defendants

/s/ Paul Brinkman

QUINN EMANUEL URQUHART &
SULLIVAN, LLP
Paul Brinkman, VSB # 35950

777 Sixth Street NW, 11th Floor
Washington, District of Columbia 20001-3706
Phone: (202) 538-8000
Fax: (202) 538-8100
paulbrinkman@quinnemanuel.com

Counsel for Plaintiffs